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Attorney for Trystone Capital Assets, LLC

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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

In Re:

PATTIE ZAMORE

Debtor.

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:  
: Case No. 19-14769-MBK  
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: Chapter 13  
:  
: Judge: Kathryn C. Ferguson  
:  
: **OBJECTION TO PLAN**  
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I, Anthony L. Velasquez, Esq., hereby certify and affirm as follows:

1. I am an attorney-at-law of the State of New Jersey, and I am counsel for Secured Creditor Trystone Capital Assets, LLC (“Creditor Trystone”), in this matter. I have personal knowledge of the following facts which I certify to be true.
2. Creditor Trystone holds a Tax Sale Certificate #17-0476 against the real property owned by the Debtor and located at 15 Langley Place, New Brunswick, NJ, aka Block 506, Lot 8. It was sold at public sale on December 20, 2017, and is recorded with the Middlesex County Clerk at Book 17169, Page 778.
3. The Tax Sale Certificate #17-0476 remains delinquent, and is now over 2 years old; thus pursuant to *N.J.S.A. 54:5-86* is subject to foreclosure. In preparation for the foreclosure and in accord with *R. 4:64-1(a)* my office conducted a “title search”. In doing so, we discovered for the first time this Bankruptcy case pending for Debtor. Creditor Trystone was not named or noticed in the original Voluntary Petition.
4. The Tax Sale Certificate #17-0476 is a secured debt. It is required to be paid in full, and Debtor is required to amend the Plan to include this debt in full. We have submitted a Proof of Claim, with an attached copy of Tax Sale Certificate #17-0476 on this same date.
5. I have now searched the entirety of this Bankruptcy File and I see that at Document #55 submitted as an Amended Schedule, on February 19, 2020, the Debtor lists “Trystone Capital Assets, LLC” but mistakenly identifies this creditor as unsecured domestic support obligation.

6. Trystone did not receive notice of this schedule, nor did it identify the debt/ claim to which it related. Only upon my office completing a title search did we learn of this Bankruptcy.

7. For these reasons, it is requested that the Court reject the Plan until such time as Debtor amend it to include Creditor Trystone's claim in full.

I hereby certify and affirm, under penalty of perjury, that the aforesaid statements made by me are true. I am aware that if they are knowingly false, I am subject to punishment.

7/2/2020

By: /s/ Anthony L. Velasquez, Esq.  
Anthony L. Velasquez, Esq.  
Attorney for Secured Creditor  
Trystone Capital Assets, LLC